

**Government of the District of Columbia**  
**Department of Health**  
**Environmental Health Administration**

**Bureau of Hazardous Material  
& Toxic Substances**



**Hazardous Waste Division**

# FACT SHEET

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The Department of Health took rulemaking action to repeal the Hazardous Waste Regulations in chapters 40 through 54 of Title 20 of the District of Columbia Municipal Regulations (DCMR), and to replace them with updated Hazardous Waste Management Regulations, codified in chapters 42 and 43 of Title 20 DCMR. The new regulations incorporate by reference the satellite accumulation provisions found in the federal Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR §262.34 (c)(1). However, the District made substantial changes to the wording of the federal regulation that affects how waste is to be managed at the satellite generation point. The following discussion presents the District's analysis of the intent for application of this regulation:

1. The satellite accumulation provisions in 40 CFR § 262.34(c)(1)(ii), allow a generator to mark containers with either the words 'Hazardous Waste' or with other words that identify the contents of the container. However, 20 DCMR §4262.4 (a)(1), requires that containers use only the words 'Hazardous Waste' **and** must also be marked with the date on which the accumulation began.
2. 40 CFR § 262.34(c)(2) allows a generator to accumulate up to 55 gallons before having to ship the excess amount. The District does not limit the quantity of waste that may be accumulated at the satellite generation point to 55-gallons but rather limits the time the waste may be kept at the satellite generation point. 20 DCMP §4262.4(a)(2) prohibits the waste from being accumulated at the satellite generation point for longer than 90 days for a large quantity generator, or 180/270 days for a small quantity generator.
3. The container management standards referenced to in the federal satellite accumulation regulation at 40 CFR §262.34(c)(1)(i) have been modified in the District regulations found at 20 DCMR §4265.7 to require secondary containment pursuant to 40 CFR §264.175, and closure requirements pursuant to 40 CFR §264.178.

In summary, District regulations permit generators to keep labeled and dated containers of hazardous waste at or near any point of generation, which is under the control of the operator of the process generating the waste, for limited periods of time. Any questions concerning the regulatory requirements for waste accumulation may be addressed to:

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